



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

June 10, 2020

BY ECF

The Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: *United States v. Curt Herrera*, 93-CR-0203-5 (LGS)
Curt Herrera v. United States, 20-CV-02957 (LGS)**

Dear Judge Schofield:

The Government respectfully requests an extension of time from June 15, 2020, to July 15, 2020, within which to file its response to *pro se* defendant Curt Herrera's motion under 28 U.S.C. § 2255, docketed on April 10, 2020. (Dkt. 173 in case 93 Cr. 203-5 (LGS)). On April 16, 2020, the Court ordered the Government to respond to the defendant's motion by June 15, 2020. (Dkt. 174). Because the previous Assistant United States Attorney handling this matter has left the United States Attorney's Office, the Government did not receive notification of the Court's April 16, 2020 Order until May 13, 2020. (Dkt. 176). An extension through July 15, 2020 will provide the Government with the ability to continue locating documents that are not available electronically because of the age of this case and to fully respond to each of the defendant's claims. The Government has not previously sought an extension of the time to respond.

The foregoing document has been mailed to the defendant via Certified United States Postal Service Mail at the following address: Curt Herrera, Reg. No. 34429-054, FCI Hazelton, Federal Correctional Institution, P.O. Box 5000, Bruceton Mills, WV, 26525.

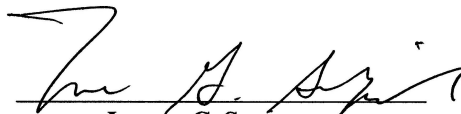
Application GRANTED. The Government shall file its response to Defendant Herrera's 2255 motion by July 15, 2020. Defendant Herrera shall file a reply, if he wishes, by August 15, 2020. SO ORDERED.
Dated: June 15, 2020
New York, New York

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/ Brandon D. Harper
Brandon D. Harper
Assistant United States Attorney
(212) 637-2209

cc: Curt Herrera (via US Mail)


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE